Vernon H. Crockett
Chief, Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

SUBJ: RCRA Compliance Evaluation Inspection
Mercedes-Benz US International, Inc.
EPA ID Number: ALR000002246

Dear Mr. Crockett:

On November 28, 2017, a U.S. Environmental Protection Agency Compliance Evaluation Inspection was conducted at Mercedes-Benz US International, Inc., located in Vance, Alabama, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

Apparent violations of RCRA were discovered. Please follow-up with Mercedes-Benz US International, Inc. to ensure violations have been addressed.

Enclosed is a copy of the EPA inspection report. If you have any questions regarding this matter, please contact Paula Whiting, of my personnel, by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Karl Moeller
Environmental Engineer
Mercedes-Benz US International, Inc.
1 Mercedes Drive
Vance, Alabama 35490

SUBJ: RCRA Compliance Evaluation Inspection
Mercedes-Benz US International, Inc.
EPA ID # ALR000002246

Dear Mr. Moeller:

Enclosed is a copy of the U.S. Environmental Protection Agency inspection report documenting the results of the November 28, 2017, inspection of Mercedes-Benz US International, Inc. located at 1 Mercedes Drive, Vance, Alabama. This was an EPA compliance evaluation inspection (CEI) for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act (RCRA) regulations.

A copy of this report has been forwarded to the Alabama Department of Environmental Management (ADEM) for follow-up.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at [HYPERLINK "mailto:whiting.paula@epa.gov."]

Sincerely,

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

cc: Marlon McMillan, Industrial Hazardous Waste Program, ADEM Land Division

RCRA Inspection Report

1) Inspector and Author of Report

Paula A. Whiting
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-9277

2) Facility Information

Mercedes-Benz US International, Inc.
1 Mercedes Drive
Vance, Alabama 35490
Tuscaloosa County
EPA ID: ALR000002246

3) Responsible Official

Karl Moeller
Environmental Engineer
Mercedes-Benz US International, Inc.
1 Mercedes Drive
Vance, Alabama 35490

4) Inspection Participants

Karl Moeller	Mercedes-Benz US International, Inc.
Sarahanne Davidson	Mercedes-Benz US International, Inc.
Channing Olive	Mercedes-Benz US International, Inc.
Ryan Slovensky	Nexeo Solutions
Marlon McMillan	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

November 28, 2017 at 9:15 a.m. CST

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal

Regulations (C.F.R.) Parts 260-270, 273 and 279.

ADEM Administrative Code 335 Division 14

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.34(a)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a Large Quantity Generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.03(5)(a)1.-6. [40 C.F.R. § 262.34(a)(1)-(4)] (hereinafter referred to as the "LQG Permit Exemption").

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Mercedes-Benz US International, Inc., EPA ID# ALR000002246 with the applicable regulations.

8) Facility Description

The Mercedes-Benz US International, Inc., Vance, Alabama is a manufacturer of luxury automotives. This facility assembles the C-Class sedan, the GLE coupe, and GLE and GLS sport utility vehicles.

The facility is located on 966 acres with a production area of 7.5 million square feet. The facility production areas consist of two Assembly Shops, a Body Shop and a Paint Shop. This location has been in operation since 1997. The facility has 4,500 permanent employees and 3,500 contract and temporary employees, and operates twenty-four hours a day, one to three shifts and five days a week.

The on-site water treatment plant is used to filter the incoming city water used in the paint shop. The on-site wastewater treatment plant treats the paint shop water before sending it to the City of Tuscaloosa publicly owned treatment works. This facility is also a major emission source and has a Title V permit.

Mercedes-Benz US International, Inc.'s most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 3, 2017, characterized the facility as a large quantity generator (LQG) of hazardous waste.

Currently Mercedes-Benz US International, Inc. may generate hazardous waste streams, spent aerosol cans, used solvent, used oil, universal lamps and batteries, paint waste and other wastes which include EPA Waste Codes D001, D005, D009, D018, D035, F003 and F005.

9) Previous Inspection History

This facility was previously last inspected on June 4, 2013 by ADEM. Seven violations were found and returned to compliance on August 7, 2013.

10) Findings

Upon arriving at the Mercedes-Benz US International, Inc. facility, the inspectors signed in at the security office at 9:15 a.m. CST, and then presented their credentials to Mr. Karl Moeller, Senior Environmental Engineer and Ms. Sarahanne Davidson, Environmental Engineer.

A brief explanation for the purpose of the inspection was given, as well as an introduction of the ADEM and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the walk-through.

10.1 Assembly 1

The tour began in Assembly 1 where the C-Class sedans are produced. The inspectors observed the satellite accumulation areas (SAAs) located on the assembly floor. Also universal wastes batteries are collected in yellow bins throughout the facility and picked up every 30 days by Nexeo Solutions.

The Assembly 1 Fuel Fill SAA contained the following four black 55-gallon drums: gasoline contaminated debris, spent aerosol cans, gasoline for recycling on a secondary containment pallet, and non-hazardous waste oil contaminated debris. All containers were observed closed and labeled.

The Assembly 1 Clear Coat Paint Mix Room was an enclosed area next to the scratch touch up paint booth. The SAA contained the following containers: a parts washer for clear coat contaminated equipment, a 55-gallon drum of waste clear coat solvent, a parts washer for base coat/primer contaminated equipment, a 55-gallon drum of base coat/primer waste, and a 55-gallon drum of non-hazardous clear coat/2K primer contaminated debris. All containers were observed closed and labeled.

Assembly 1 Windshield Rear Glass SAA contained an open 55-gallon drum of discarded primer bottles and associated primer debris and a 55-gallon drum of non-hazardous oily debris (Pictures 1-2). Mr. Moeller closed the drum lid during the inspection. Both containers were labeled.

Assembly 1 Location A-17 SAA contained a 55-gallon drum of discarded primer bottles and associated primer debris and a non-hazardous 55-gallon of discarded caulk. All containers were observed closed and labeled.

The tour then moved to the Assembly 1 C-Class Body Shop where the automated process welds the chassis parts together. The inspectors observed non-hazardous waste drums of sealant throughout the shop.

10.2 Assembly 2

Assembly 2 is where the sports utility vehicles and the GLE coup are produced. The inspectors observed the SAAs and yellow universal waste battery bins located on the assembly floor.

Assembly 2 Paint Mix Room had a consolidated 55-gallon drum of base coat/primer waste and clear coat/2K primer waste (Pictures 3-4). The inspectors asked why the two waste streams were combined in this area and not in Assembly 1. Mr. Moeller was not sure why the waste streams were combined but promised to ask Nexeo. In addition, Mr. Moeller stated that that the waste streams

were not significantly different. The container was observed closed and labeled.

Assembly 2 Fuel Fill SAA contained a 55-gallon drum of gasoline contaminated debris and 7 non-hazardous 55-gallon drums of used oil, antifreeze, contaminated debris and used Enviro-Armor C-Blue. All containers were observed closed and labeled.

Assembly 2 Liftgate Sequencing SAA contained a 55-gallon drum of discarded primer bottles and associated primer debris. The container was observed closed and labeled.

Outside of the Assembly 2 entrance was the Supply Shop. The inspectors observed a yellow bin of universal waste batteries (Pictures 5-6). The bin was labeled and dated.

10.3 Paint Shop

The Paint Shop is separated into the paint blending and purging area and the paint booths. The paint blending and purging area had two SAAs. The first SAA was located near the purging solvent parts washers (Pictures 7-10). The SAA had a 55-gallon drum of base coat and primer waste sitting on secondary containment and a 55-gallon drum of non-hazardous waste primer debris. The containers were closed and labeled.

In the same area was a waterborne waste recovery system with two 300-gallon totes used to collect non-hazardous waste water from the paint purge system and send it to the waste water treatment plant (Picture 14). At the time of the inspection, the system was not in operation and a hazardous waste label had been placed on the totes. Mr. Moeller confirmed that the labels were incorrect and removed them immediately.

The second SAA was located in the rear of the paint blending tanks (Pictures 10-13). The inspectors observed a 55-gallon drum of purged paint sitting on secondary containment and an empty 55-gallon drum for non-hazardous waste debris. The containers were closed and labeled.

In the blending room the inspectors also observed sump grating in the floor. Mr. Moeller explained that the floor is mopped twice a day with POLYCHEM AcraStrip 600 B&G Mod (Automotive) which is used to remove solvent-borne and waterborne coatings during purge and clean-up tasks. The mop water is then pumped to the waste water treatment plant.

Outside the purge and blending area, the inspectors observed a table with two boxes of discontinued BASF white primer (Pictures 15-16). Mr. Moeller believed that the containers were waiting for pickup by Nexeo.

Paint Shop Paint Repair Mixing Room is on the second floor the Paint Booth. At the time of the inspection, the inspectors observed the following:

- A fume hood with used paint filters (Picture 19)
- An open 55-gallon drum of waste clear coat solvent (Pictures 20-21)
- An empty 55-gallon drum for waste clear coat solvent (Picture 20)
- A non-hazardous waste drum of clear coat contaminated debris (Picture 22), and
- A pint cup and two small applicator containers of used liquid clear coat discarded in the non-hazardous waste drum (Pictures 17-18, 23-24).

Ms. Davidson and Mr. Moeller closed the open drum during the inspection. Mr. Moeller removed the small containers of used liquid clear coat from the non-hazardous waste drum. Mr. Moeller explained that once the clear coat started to thicken it was no longer usable. The paint technician should have allowed the liquid to fully harden before discarding into the non-hazardous waste drum, thus rendering the waste non-hazardous. As a liquid the clear coat is still considered hazardous, and thus was improperly disposed of.

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)4. [40 C.F.R. § 262.34(a)(4)], which incorporates ADEM Admin. Code r. 335-14-9 [40 C.F.R. § 268], and is a condition of the LQG Permit Exemption, a generator is required to comply with land disposal restrictions (LDR) for hazardous waste.

The inspectors advised that more containers of liquid clear coat may be in the non-hazardous waste drum and should be removed. Additionally, refresher training on the proper disposal of the used liquid clear coat should be addressed. Mr. Gerry Kain, Manager stated that refresher training had already been implemented for this issue during the inspection.

Paint Booths were observed in operation. Mr. Moeller explained that the paint overspray on the grating was washed down with water, and sent below the grating to the wastewater treatment plant. A "paint pill" is added to the wastewater to help separate the paint sludge from the water. The paint sludge is collected for non-hazardous waste disposal.

Outside the Paint Booth was a non-hazardous waste drum containing a gray tube of liquid base coat and primer and several pint containers of discarded liquid paint (Picture 25). Mr. Moeller stated that no liquid waste was to be disposed of in the non-hazardous waste drums. Mr. Moeller also stated that containers of liquid were non-hazardous but still should not have been placed in this drum.

10.4 HazMat

The hazardous material area (HazMat) is run by contractor, Nexeo Solutions. The inspectors were escorted by Mr. Ryan Slovensky, Manager through the facility. Nexeo is responsible for handling the incoming waste streams from the facility and properly packaging and shipping out the waste streams.

The less than 90-day hazardous waste storage area (HWSA) is an enclosed room in the HazMat. Mr. Slovensky stated a shipment of hazardous waste occurred two weeks prior to the inspection. Inside the HWSA, the inspectors observed four 330-gallon metal totes of purge solvent (Picture 27). The totes had the facility HazMat labels but not the proper hazardous waste labels (Picture 26). The totes were observed closed and dated.

Across the aisle were 32 55-gallon drums of discontinued airbags for the R-Class automotive (Pictures 28-29). MBUSI and Nexeo had contacted ADEM for assistance in determining how to properly dispose of the discontinued airbags. The facility was told that within Alabama the airbags could be shipped for recycling, but if shipped outside the State the airbags are considered hazardous waste. In the past the facility has shipped the airbags to Lighting Resources LLC in Johnson City, TN for disarming and disposal. However, due to the change in regulation and freight costs, the facility is looking for alternatives within their 90-day window. The containers were closed, labeled and dated.

The universal waste storage is a fenced area within the HWSA. The inspectors observed the following:

- Fourteen 4- and 8- foot spent fluorescent lamp boxes on a pallet (Picture 30). The boxes were closed, labeled with the oldest dated April 14, 2017.
- A 55-gallon drum of spent alkaline batteries (Picture 31)
- A 55-gallon drum of discarded airbags labeled as non-RCRA material and dated October 2, 2017. The inspectors advised Mr. Slovensky to properly label the drum as hazardous waste (Picture 31).

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)3. [40 C.F.R. § 262.34(a)(3)], which is a condition of the LQG Permit Exemption, a generator is required to label or clearly mark each container and tank accumulating hazardous waste on-site with the words: "Hazardous Waste."

- A 55-gallon drum of spent lithium batteries dated November 21, 2017 (Picture 31)
- A 55-gallon SAA drum of crushed fluorescent lamps (Picture 31)
- A 55-gallon drum of non-PCB non RCRA ballasts dated November 28, 2017 (Picture 33)
- A pallet of spent lead acid batteries with the oldest dated November 21, 2017 (Picture 32)

Unless otherwise stated, the containers were observed closed, labeled and dated.

The inspectors observed next to the universal waste storage was an electronic waste storage area (Picture 34.)

The incoming waste was stored on the loading dock until the containers could be sorted and placed in the proper storage area (Picture 35). The inspectors observed 8 330-gallon totes with at least four totes from the clear coat spill, and 29 55-gallon drums of hazardous wastes, non-hazardous wastes and used oil. Mr. Slovensky explained that Tuesdays are the usual sorting days for the incoming waste. Often the second shift moves the daily incoming containers into their proper storage areas.

Discontinued or discarded car parts are also processed by Nexeo. The inspectors observed brand new diesel engines to be sent out as scrap metal, gasoline tanks with the gasoline removed that were not to specifications, and tires with rims to be removed and the tires shredded.

The inspectors observed an aerosol can puncture system on top of a 55-gallon drum that was labeled as "used oil" (Picture 37). The aerosol can puncture system was observed open at the time of the inspection (Pictures 36, 38). Mr. Slovensky closed the puncture system lid. However, the label was incorrect and should be marked as "hazardous waste".

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(c)1.(ii) [40 C.F.R. § 262.34(c)(1)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark satellite accumulation containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

The inspectors then conducted a records review.

Records Review

The inspectors requested the training records, contingency, inspection records, the 2016-2017 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated March 3, 2017.

The inspectors requested the training records for the employees handling hazardous waste. Mr. Ryan Slovensky provided training records and sign-in sheets for the Hazardous Materials Technician-Level C training on December 19-21, 2016; and Regulated Waste Handling training on August 22, 2017; Tier II and RCRA training on September 26, 2017. All Nexeo Solution employees were trained and MBUSI employees: Gerry Kain, Karl Moeller, Channing Olive and Sarahanne Davidson also under went these training courses.

Job titles and descriptions for the Nexeo Solutions employees were provided and review. The Material Handler, Warehouse Person Lead and Site Supervisor clear stated the RCRA hazardous waste duties, however, the Warehouse Person position did not clearly describe these duties.

The inspectors requested the Contingency Plan. The plan included a current emergency contact without contact home addresses, a fire extinguisher inspection list, an evacuation map and a list of emergency response equipment. Documentation (i.e., green return receipt cards) that copies of the contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital) was available.

The inspectors reviewed the weekly inspection records from January 2016 – November 2017 for the HWSA. In the hazardous waste storage area inspection records, inspectors observed the weekly inspections were being conducted daily however, the following information was not being documented on the inspection log: the inspection dates and times, the name of the inspector, the number of containers, and the volume of the containers.

Pursuant to ADEM Admin. Code r. 335-14-6-.02(6)(d) The owner or operator must record inspections in an inspection log or summary. He must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

Hazardous and non-hazardous manifests were reviewed for 2017. Hazardous wastes were shipped to Giant Resource Recovery, LLC (EPA ID ALD070513767) in Attalla, AL. The land disposal restriction forms were reviewed.

Universal waste lamps and batteries, discarded airbags, discarded automotive parts, electronic wastes, non PCB ballasts, broken fluorescent lamps for recycling and spent lead acid batteries were shipped to Lighting Resources, LLC (EPA ID TNR000039925) in Johnson City, TN.

Used oil was shipped to Universal Environmental Services, LLC (EPA ID ALR000002485) in Sylacauga, AL.

11) Summary

The inspectors conducted the exit meeting with Mr. Gerry Kain, Manager and Ms. Davidson. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. Mercedes-Benz US International, Inc. was inspected as a large quantity generator of hazardous waste. At the time of the inspection, Mercedes-Benz US International, Inc. did not appear to be in compliance with some requirements of RCRA.

Follow Up Responses from Mercedes-Benz US International, Inc.

On November 30, 2017, Ms. Davidson emailed the following response to the inspectors:
In response to the ADEM and EPA inspections that took place on 11/28/2017, please see our corrective actions below. Supporting documents and training logs are attached (in the email).

Observation: Documentation of weekly hazardous waste inspection was missing information such as date, time, number of containers present, etc. throughout log

- MBUSI Response: Nexeo revised the 90-Day Hazardous Waste Accumulation Area Weekly Inspection form to explicitly identify all required information. A retraining of all Nexeo personnel took place on 11/29/2017 to review proper documentation of inspection observations in the revised form.

Observation: A hazardous waste puncture and drain unit was incorrectly labeled as "used oil." The same unit was observed not closed but was corrected during inspection.

- MBUSI Response: A retraining of all Nexeo personnel took place on 11/29/2017 to review the Aerosol Can Recycling SOP, which clearly outlines procedures to ensure correct labeling and closure of unit when not actively emptying aerosol cans.

Observation: An airbag was observed in a container labeled nonhazardous waste. The label was corrected during inspection.

- MBUSI Response: A retraining of all Nexeo personnel took place on 11/29/2017 to review proper drum labeling, including labeling of airbags as hazardous waste.

Observation: Clearcoat mixing containers were observed in a nonhazardous waste container before the mixture was allowed to solidify. The free liquid was removed during inspection.

- MBUSI Response: A retraining of the affected Paint Shop team members took place on 11/30/2017 to review all requirements for satellite accumulation areas, including the requirement to wait until two component prime or clearcoat liquids have solidified before disposal in a drum.

12) Signed

Paula A. Whiting,
Environmental Engineer

Date

Concurrence

Alan A. Annicella, Chief
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Date

ATTACHMENT A

MERCEDES-BENZ US INTERNATIONAL, INC.

VANCE, ALABAMA

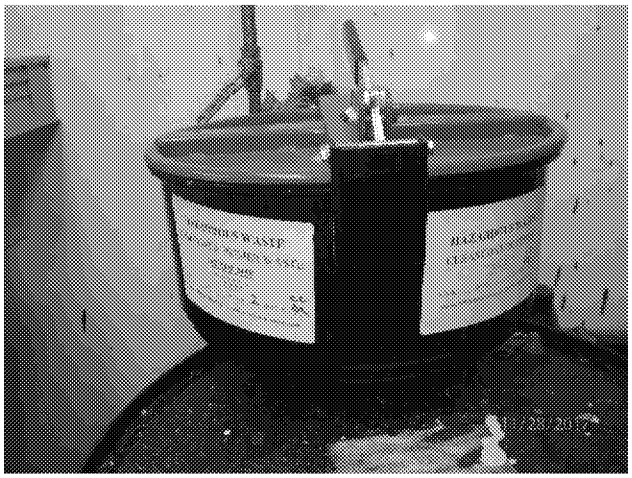
COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

NOVEMBER 28, 2017

Picture [SEQ Picture * ARABIC] – Assembly 1 Windshield Rear Glass SAA drum label

Picture [SEQ Picture * ARABIC] – Assembly 1 Windshield Rear Glass SAA drum

Picture [SEQ Picture * ARABIC] – Assembly 2 Paint Mix Room consolidated paint waste drum



Picture [SEQ Picture * ARABIC] – Assembly 2 Paint Mix Room SAA drum with two labels

Picture [SEQ Picture * ARABIC] – Assembly 2 Supply

Room UW battery container

Picture [SEQ Picture * ARABIC] – Assembly 2 Supply Room UW battery container

Picture [SEQ Picture * ARABIC] – Paint Shop nonhazardous waste debris drum

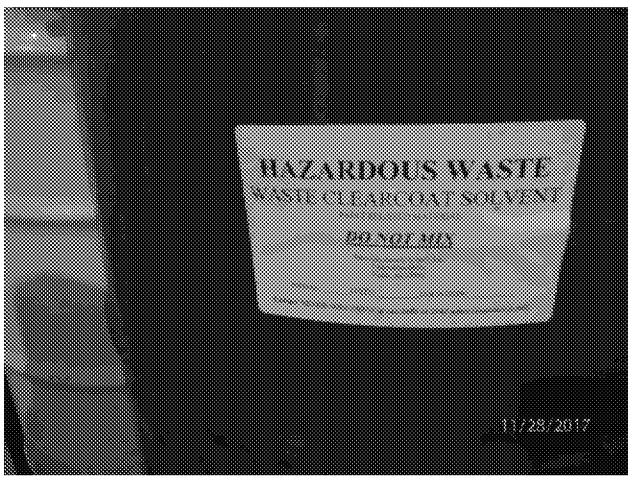
Picture [SEQ Picture * ARABIC] – Paint Shop nonhazardous waste debris drum

Picture [SEQ Picture * ARABIC] – Paint Shop SAA drum

Picture [SEQ Picture * ARABIC] – Paint Shop paint purge parts washer

Picture [SEQ Picture * ARABIC] – Paint Shop Mixing Room SAA

Picture [SEQ Picture * ARABIC] – Paint Shop waterborne waste recovery system



Picture [SEQ Picture * ARABIC] – Paint Shop Mixing Room SAA label

Picture [SEQ Picture * ARABIC] – Paint Shop boxes of expired primer

Picture [SEQ Picture * ARABIC] – Paint Shop Mixing Room non-HW drum

Picture [SEQ Picture * ARABIC] – Paint Shop boxes of

expired primer

Picture [SEQ Picture * ARABIC] – Paint Shop Paint Repair Mixing Room non-HW drum

Picture [SEQ Picture * ARABIC] – Paint Shop Paint Repair Mixing Room SAA

Picture [SEQ Picture * ARABIC] – Paint Shop Paint Repair Mixing Room liquid clear coat container in non-HW drum

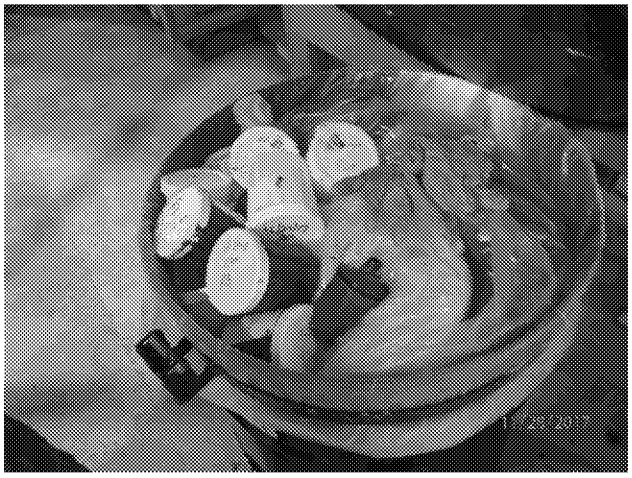
Picture [SEQ Picture * ARABIC] – Paint Shop Paint Repair Mixing Room open SAA drum

Picture [SEQ Picture * ARABIC] – Paint Shop Paint Repair Mixing Room fume hood

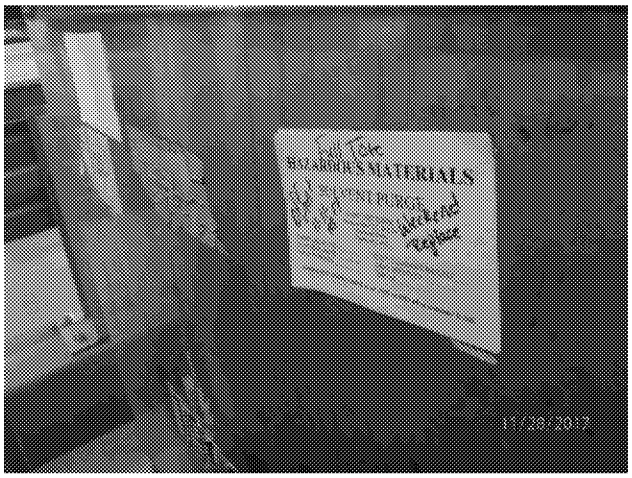
Picture [SEQ Picture * ARABIC] – Paint Shop Paint Repair Mixing Room non-HW drum

Picture [SEQ Picture * ARABIC] – Paint Shop Paint Repair Mixing Room liquid clear coat container in non HW drum

Picture [SEQ Picture * ARABIC] – Paint Shop Paint Repair Mixing Room liquid clear coat container improperly disposed of



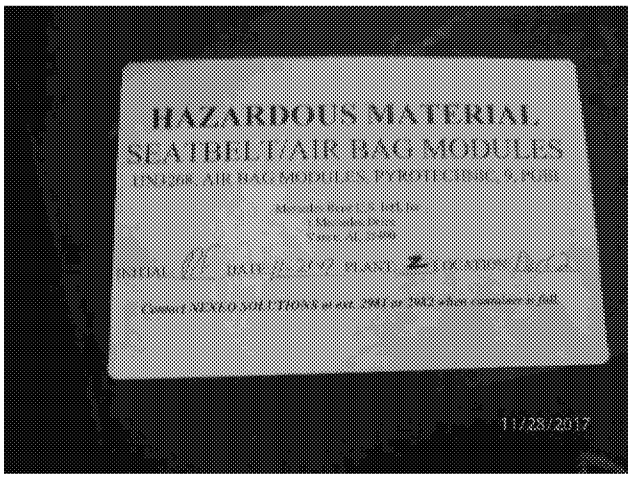
Picture [SEQ Picture * ARABIC] – Paint Shop paint line non-HW drum filled with liquid containers of paint waste



Picture [SEQ Picture * ARABIC] – HazMat 90 Day HWSA solvent purge tote label

Picture [SEQ Picture * ARABIC] – HazMat 90 Day HWSA solvent purge totes

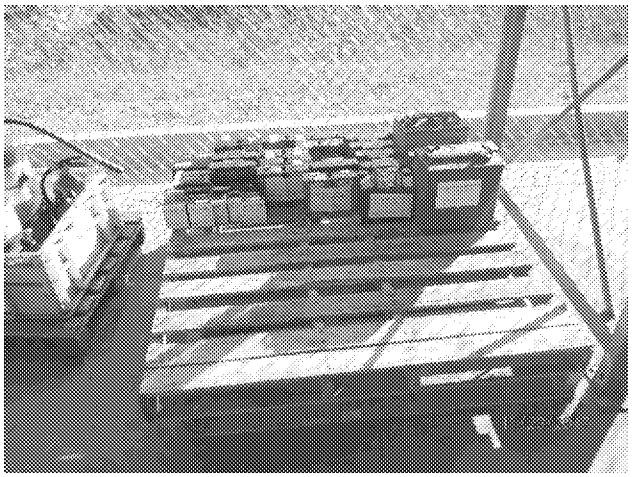
Picture [SEQ Picture * ARABIC] – HazMat 90 Day HWSA discontinued airbags



Picture [SEQ Picture * ARABIC] – HazMat 90 Day HWSA discontinued airbag label


Picture [SEQ Picture * ARABIC] – HazMat universal waste lamps

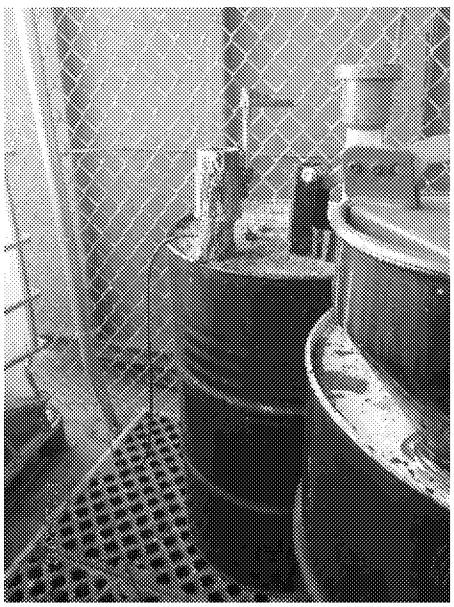

Picture [SEQ Picture * ARABIC] – HazMat universal waste batteries, crushed lamps and airbags


Picture [SEQ Picture * ARABIC] – HazMat spent lead acid batteris

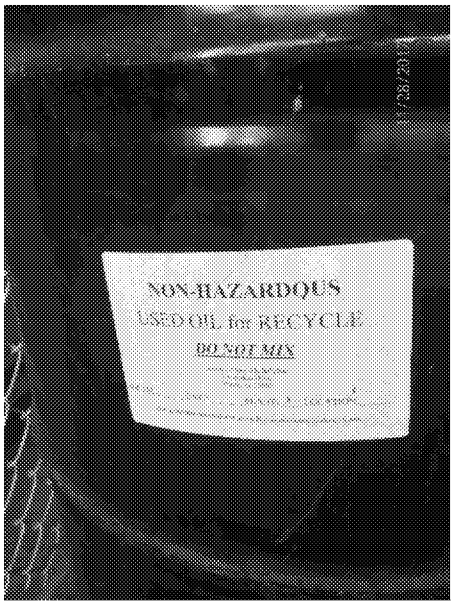

Picture [SEQ Picture * ARABIC] – HazMat non PCB ballasts


Picture [SEQ Picture * ARABIC] – HazMat electronic waste

Picture [SEQ Picture * ARABIC] – HazMat incoming waste area



Picture [SEQ Picture * ARABIC] – HazMat spent aerosol can puncture system open



Picture [SEQ Picture * ARABIC] – HazMat spent aerosol can puncture system labeled incorrectly as "Used Oil"

Picture [SEQ Picture * ARABIC] – HazMat spent aerosol can puncture system and discarded solvent debris drum